

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Commonwealth of Pennsylvania,
By Attorney General Josh Shapiro,

Plaintiff,

v.

Navient Corporation and Navient
Solutions, LLC,

Defendants.

Case No. 3:17-cv-1814

(Hon. Robert D. Mariani)

(Electronically Filed)

**PLAINTIFF’S UNOPPOSED
MOTION FOR ENTRY OF CONSENT JUDGMENT**

Plaintiff Commonwealth of Pennsylvania, by Attorney General Josh Shapiro (hereinafter “the Commonwealth” or “Plaintiff”) respectfully request that this Court enter the proposed Consent Judgment, attached as Exhibit 1, for the following reasons:

1. The parties have reached an agreement, set forth in the terms of the Consent Judgment, to resolve the Plaintiff’s claims against the Defendants.
2. The entry of the Consent Judgment promotes the orderly resolution of controversy and judicial economy and is in the public interest.

Wherefore, the Plaintiff moves this Court to enter the proposed Consent Judgment. As required by Local Rule 7.1, Nicholas F. B. Smyth, attorney for Plaintiff, has discussed this motion with counsel for the Defendants and certifies that the Defendants have given their concurrence in this motion.

Respectfully submitted,

COMMONWEALTH OF
PENNSYLVANIA

JOSH SHAPIRO
ATTORNEY GENERAL

Date: January 12, 2022 By: /s/ Nicholas F. B. Smyth
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